DANIEL G. BOGDEN
United States Attorney
District of Nevada
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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,  Plaintiff,	) Case No.: 2:16-cr-0030-JAD-CWH ) STIPULATION TO CONTINUE
VS.	) SENTENCING ) (Second Request)
MARIA GUADALUPE HERNANDEZ- CORTES, Defendant.	) ) )
	<u>)</u>

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Susan Cushman, Assistant United States Attorney, counsel for the United States of America and Benjamin Durham, Esq., counsel for defendant, that sentencing in the above-captioned matter currently scheduled to commence on Monday, February 27, 2017, at 10:00 a.m. be vacated and continued to a date and time convenient to all parties, but no earlier than 60 days.

This Stipulation is entered into for the following reason:

1. The government needs additional time to determine whether there will be a recommendation for a two-level reduction in the defendant's base offense level for a group plea pursuant to *United States v. Caro*, 997 F.2d 657 (9<sup>th</sup> Cir. 1993).

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2. T	The parties	agree to	the continuance	e.
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- 3. The defendant is not in custody and does not object to the continuance.
- 4. This is the second request to continue the sentencing.

DATED this  $23^{rd}$  day of February 2017.

Respectfully submitted,

DANIEL G. BOGDEN United States Attorney

/s/ Susan Cushman

SUSAN CUSHMAN
Assistant United States Attorney

/s/ Benjamin Durham

BENJAMIN DURHAM
Counsel for Defendant

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	) Case No.: 2:16-cr-0030-JAD-CWH
Plaintiff,	) ORDER TO CONTINUE
vs.	) SENTENCING )
MARIA GUADALUPE HERNANDEZ- CORTES,	)
Defendant.	) _)

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby orders that sentencing in the above-captioned matter be vacated and continued until May 16, 2017 at the hour of 9:00 a.m.

DATED this 23rd day of February, 2017.

UNITED STATES DISTRICT JUDGE